

# Illinois EPA Handler **Generator Status Update Form**

Record required RCRAInfo handler data fields for facilities determined by an inspection to have a change in generator status.

ILD005154778 BOL ID# 10910 S. Langley Ave. ILR000114512 5619 S. Cottage Grove ILR000124008 5540 S. Hvde Park Ave. ILR000124016 5445 Ingleside Ave. ILR000124024 5454 S. Shore Dr. ILR000129106 1027 E. 57th St. ILR000146787

1369 E. Hyde Park Ave.

ILR000143750 **Nursery School** 

Date of Inspection:

8/24/9 10/5/9

Inspector Name: Diane Sharrow

**FPA Identification Number:** 

ILD005154778

10910 S. Langley Ave.

ILR000114512

5619 S. Cottage Grove

ILR000124008

5540 S. Hyde Park Ave.

ILR000124016 5445 Ingleside Ave. ILR000124024 5454 S. Shore Dr. ILR000129106 1027 E. 57th St.

ILR000146787

1369 E. Hyde Park Ave.

ILR000143750 **Nursery School**  US EPA RECORDS CENTER REGION 5



Installation Name:	University of Chicago & University of Chicago
	Hospital

See list above & attached PDF Location Street Address:

Location City: Chicago Location State: Illinois

Location Zip Code: 60637

Location County: Cook

**Current Generator Status:** 

Not a generator (see attached PDF)

N - Not a Generator

1 - Large Quantity Generator

2 - Small Quantity Generator

# 3 - Conditionally Exempt SQG

### Comments:

The University of Chicago is using ID NO ILD005421136 on all manifests for all hazardous waste generated at the University and the University of Chicago Hospital. RCRA Info shows the address for ILD005421136 as 960 E. 58<sup>th</sup> St., Chicago, IL 60637. There is no bldg at this address – the less than 90 day storage facility is located at 6049 S. Blackstone Ave., Chicago, IL 60637.

The use of the ID NO ILD005421136 appears to be a carry over from the previous 90 day storage facility that was closed and demolished (?). Traditionally, ID Nos remain with a property location. However, the University of Chicago may have been told by the State of IL during closure activities, or the University of Chicago may have assumed that the continued use of this ID No for 6049 S. Blackstone Ave., was /is acceptable.

USEPA recommends that if the University of Chicago continues to use the ID NO ILD005421136 for 6049 S. Blackstone Ave., that the University of Chicago submit an Notification Form (EPA form 8700-12) to the State of IL – Illinois EPA to show the correct name (University of Chicago), correct mailing address of owner/operator and correct address of the less than 90 day storage facility.

### E-mail form to Donna.Nicholson@illinois.gov

Note: Some generators may not be a Large Quantity Generator at the time of the inspection, but wish to retain the Large Quantity Generator status due to intermittent status as a Large Quantity Generator. If possible, the inspector should inform the handler of any intent to change their generator status.

APR-26-2001 THU 03:10 PM IEA BOL 2275 181 04/26/2001 15:17

FAX NO. 2177829299) E C E NPEOT

APR 2 7 2801

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SPA Form 9700-12 (Rev. 10/08/05)

Ch4/27/01. 1LD00542/136

EPA Porm 8700-12 (Hey. 9-92) Province acidize is absolute.

PAGE 83 04/26/2001 15:17 A THE MAN IS THE LITERAL WAS LITTLE m made let 11 le type 171 ID - For Official Use Only VIII. Type of Regulated Wests Activity (Mark of In the appropriate boxes. Refer to instructions.) B. Used Oil Fuel Activities and rounded and extension A Herentine Wash Activity St. St. Story, Discount of Control of Contro FOR Green War Topogramin 12 2011 CM ) Orl-Specification Used Oil First :: a. Generator Marketing to Sturrer b. Otre: Marketer b 100 to 1000 horms (220 € 2.200 €) a. Burner - indicate device(s) Type of Combustion Device e Lage Pain 100 kg/mo (220 lbs.) Control of the Contro 2.\* Transporter (indicate Micae In Equal 1 - Califor

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3. Including Flamaco Total Catarral Mode of Transportation 2 - True Currier Exemption Indicate Type of Combustion Olegania Uttle Potes 2 Industrial Botton ] " \* ' 2. Specification Used Oil Fuel Marketer for On-site Burner Who First Caims the Oil Mosts the Specification ] 2 Ref 3. Highway A. Water Inquestion Furnace The Other - scalety Linderground Injection Control IX, Description of Regulated Wastes (Use additional sheets if necessary) Characteristies of Honileted Mazerdeus Wasten. Mark X' in the bonce corresponding to the characteristics of surfieled hacestion e. (See 40 CFR Parts 281.20 - 281,34) doon (LEGS) is if you need to list more than 12 wiste codes.) Wester, (500 40 CFR 261.31 - 33. Linked Newschers 20 6 17 12 Ņ۲ erto have an I.D. rumber. See instructions.) Other Wanted, (State or other ve X. Cerlification I carrily under penalty of low that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to excure that qualified personnel property gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am sware that there are significant penalties for submitting take information, including the possibility of line and imprisonment for knowing violations. Name and Official Title (type or print) Date Skin CONSULTANT BYYEL A NEW YORK XI. Comments -EXAMUN MORCURY NGBRU Note: Mail completed ferm to the appropriate EPA hagians or State Office. (See Section III of the afficience.)

APR 2 7 2001

### TELEPHONE MEMORANDUM

2/26/92 5:30pm

Jon Silberman, OE returned my call regarding University of Chicago and the interim status issue surrounding the previously regulated units that where the newly-regulated TC waste was stored. (U of C notified EPA late that it was storing new TC wastes in a previously regulated unit.) Fortuitiously, Ira Feldman, OE, stopped by Jon's office and we got him on the line as well. Their conclusion was that the neither the facility nor the regulated unit loses interim Rather the facility does not have interim authorization for these wastes at the unit in question. Ira Feldman explained that this view was supported by 40 C.F.R. 270.72. He also stated that both OGC and OE concurred with this view. Jon Silberman stated that the late notifier violation in Harrison County would not be a major/major. ^D^Q\^A;X1

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From: MARY FULGHUM (MFULGHUM)

To: rnelson

Date: Thursday, November 14, 1991 6:26 pm Subject: Late TC notifiers w/previous int. status

I just wanted to mention to you that headquarters is divided as how to treat tsd facilities that have permit or interim status but late notified (voluntarily) of new tc wastes. The issue is whether the facility attains interim status for the new tc wastes at the date of compliance or at some other time EPA determines appropriate. If you have any such late notifier cases you might suggest that they be held up until HQ comes out with its DOJ approved guidance - reportedly no later than Friday of next week.

The U of C case falls in this category.

entered for Data purposes only hanges Continued from page 2. e more than 26 wastes to list. NOTE: Photocopy this page before completing if yo FOR OFFICIAL USE ON EPA I.D. NUMBER (enter from page 1) 5 4 2 1 0 6 0 DUP DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) MA. EPA HAZARD. ZO WASTENO. C. UNIT D. PROCESSES B. ESTIMATED ANNUAL QUANTITY OF WASTE SURE (enter code) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) 1. PROCESS CODES (enter) 29 27 36 Commercial off-site incineration 1 11,200 S 0 ] (C.0.S.I.)F 0 5 F 0 2 ol ol ol 400 3 0 0 reenter-newsoned 1/1/259) 35 0 5 T 0 6 T 0 7 T 0 8 T04 4 D 0 0 4 10 704 5 D 0 0 5 10 1.0-7704 101 NIS 6 0 0 0 6 10 7 D 0 0 7 80 104 8 0 0 0 8 T-0 10 704 9 0 0 0 9 20 Commercial off-site landfill 10 0.5 S-0-1 (C.O.S.L.) D 0 1 1 10 11 0 0 1 800 K S 0 1 C.O.S.I 12 F 0 0 2 600 5.0.1 C.O.S.I 13 F 0 0 3 200 5 0 1 C.O.S.I 14 0 0 4 S<sub>0</sub>1 400 C.O.S.I 15 <u>S 0 1</u> F 0 0 5 400 K C.O.S.I. 16 8 0 C.O.S.I 15 18 15 19 5 Ð 20 0 8 7 40 K 21 0.5 C.O.S.L RECEIVED 2 Ω 0.5 22 <del>S 0 1</del> C.O.S.L. 23 <del>\*U|0|0|1</del> 06102 NOV 1 31984 ulo 0 24 2 K WMD-RAIU 80 S 0 1 C.O.S.I. EPA, REGION V 0 6 F 0 000 3 K 25 8 18: JAN 185 8 4 7 8 26 ulolo 40 K NOVINTION ON REVERSE EPA Form 3510-3 (6-80) TOY (enter "A", "B',K"C", etc. behind the "3" to identify photocopied pages) U 0 0 9 2

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## THE UNIVERSITY OF CHICAGO

CHICAGO · ILLINOIS 60637

DEPARTMENT OF CHEMISTRY 5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY . GEORGE HERBERT JONES LABORATORY SEARLE CHEMISTRY LABORATORY

November 30, 1990

Miss Juana Rojo United States Environmental Protection Agency Region V Permit Branch 230 South Dearborn Chicago, Illinois 60604

Dear Miss Rojo:

I am enclosing, as you have requested, the amended Part A permit application in which four (4) hazardous waste codes were added (line 22 through 25, page 3 C of 5) as a result of the recent Toxicity Characteristic rule.

If you have any question, please contact me either in writing or by phone (312)702-7051. Thank you.

Sincerely yours,

Sam H/Wang

Hazardous Waste Management

MARCO BONE

University of Chicago

cc: Mr. Lawrence W. Eastep Permit Section Division of Land Pollution Control Illinois Environmental Protection Agency

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Attach to this application a topographic map of the area extending t	o at least one mile beyond property bounderies. The map must show
the outline of the facility, the location of each of its existing and p	roposed intake and discharge structures, each of its hazardous waste
treatment, storage, or disposal facilities, and each well where it inje	cts fluids underground. Include all springs, rivers and other surface
water bodies in the map area. See instructions for precise requiremen	
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UNIVERSITY OF CHICAGO IS AN EDUCATIONAL INSTI	TUTION OPERATING A UNIVERSITY INCLUDING A
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XIII. CERTIFICATION (see instructions)	
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application, I believe that the information is true, accurate and confalse information, including the possibility of fine and imprisonment	10/616. I am aware that there are conditione nandcier for submission.
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NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

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David L. O'Leary  Assistant Vice President	8. SIGNATURE	L Chs.	C. DATE SIGNED
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(SEE ATTACHMENTS)

# **ATTACHMENT**

# FORM 3510-1 (X) Existing Environmental Permits

# Active Incinerators

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A. J. Carlson Animal Research Facility Anatomy Building

031600DDN

**Inactive Incinerators** 

031600DDO

Silvain Arma Weiler Childrens Hospital

031600EYY

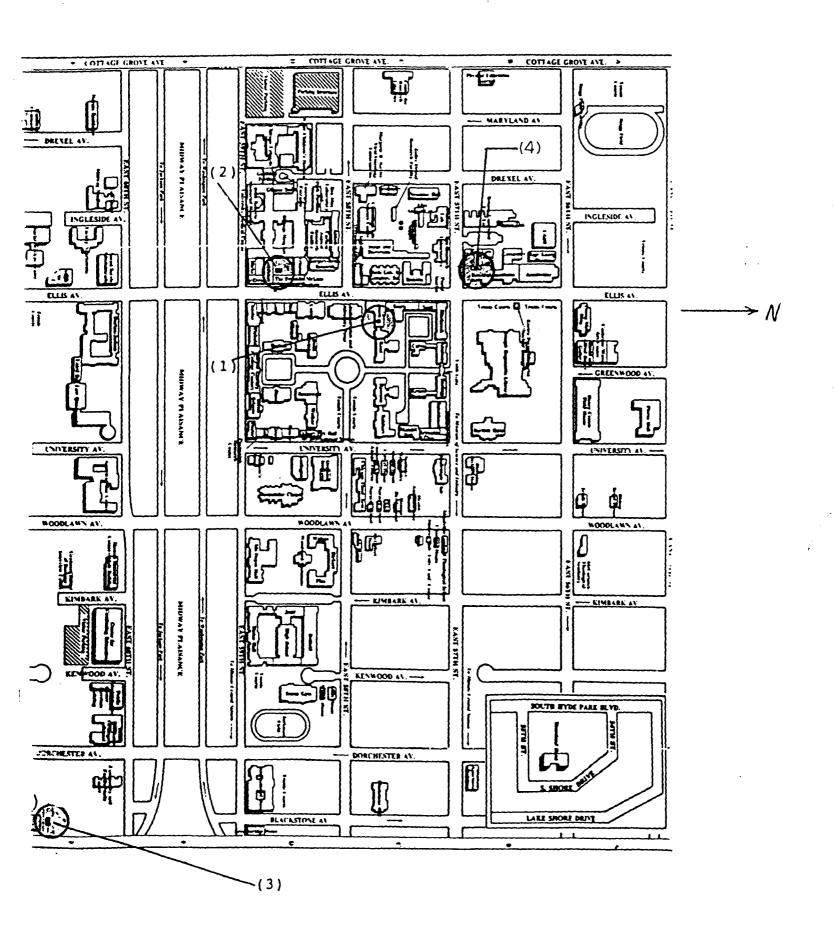
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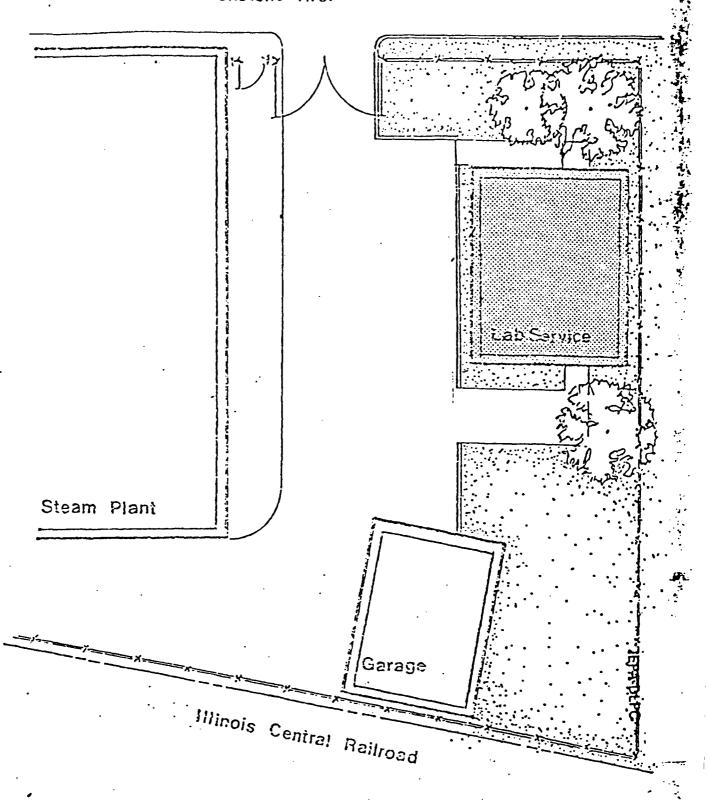
# HAZARDOUS STE ACCUMULATION AND PROCESING FACILITY

Fig. 2 University of Chicago Map

- (1) Room 16 in George Herbert Jones Laboratory
- (2) Franklin McLean Research Institute Blockhouse
- (3) Laboratory Service Building
- (4) Research Institute



S. Blackstone Ave.



01 5 10 20 40

Laboratory Service Building

THE UNIVERSITY OF CHICAGO
OFFICE OF THE ASSISTANT VICE-PRESIDE:
PHYSICAL PLANNING

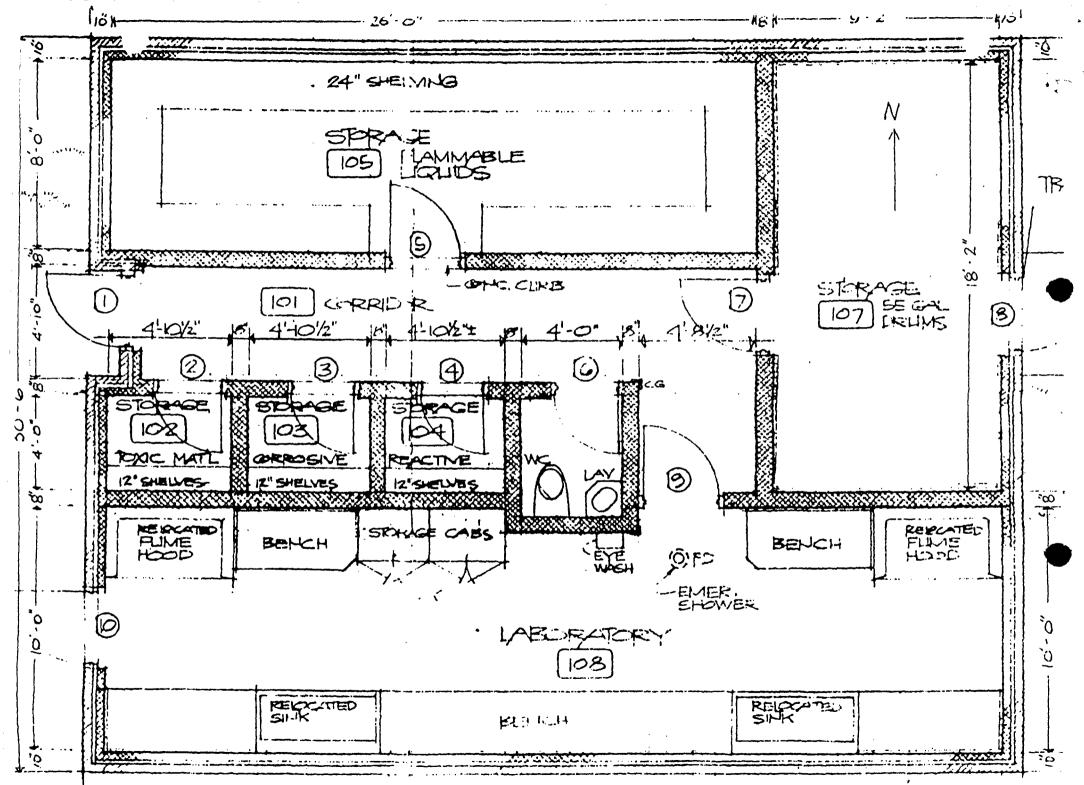


Fig. 6 Floor Plan of Laboratory Service Building

# THE UNIVERSITY OF CHICAGO CHICAGO · ILLINOIS 60637 DEPARTMENT OF CHEMISTRY 5735 SOUTH ELLIS AVENUE KENT CHEMICAL LABORATORY · GEORGE HERBERT JONES LABORATORY SEARLE CHEMISTRY LABORATORY November 9, 1984

Mr. Hugo Bursten USEPA, Region V RCRA Activities, Mail Code 5HWI2 P.O. Box A-3587

Chicago, Illinois 60690-3587

Dear Mr. Bursten:

I enclose copies of pages 3A, 3B, and 3C for The University of Chicago's Revised Part A Permit Application, revised to show estimated annual quantities of waste in units of kilograms (K) instead of liters (L).

Please let me know if you require further information.

Sincerely yours, Sourceu H. Hacktrieb

NHN:hp

Norman H. Nachtrieb Professor of Chemistry, Emeritus University Laboratory Safety Officer

RE: Revised Part A Permit Application

University of Chicago

ILD 005421136 C, TSD, PA

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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: 5HW-12

Mr. Norman Nachtrieb University Safety Officer Department of Chemistry University of Chicago 5735 South Ellis Chicago, Illinois 60637

Re: Revised Part A Permit Application

University of Chicago

ILD 005421136

Dear Mr. Nachtrieb:

The Part A penmit application for the above referenced facility has been amended to incorporate the following changes:

- 1. An increase in design storage capacity (SO1) from 1000 to 2000 liters.
- 2. The reinstatement of the treatment process capacity (TO4), at 24 liters per day.
- 3. The construction of a new building in order to consolidate the facility's waste management activities.

Approval of the first two changes is justified by 40 CFR §270.72(b) and (c). Section 270.72(b) allows for increases in the design capacity of processes when there is a lack of available storage, treatment, or disposal capacity at other waste management facilities. Section 270.72(c) allows the addition of treatment processes when there is a necessity to comply with Federal, State or local regulations. The approval of the third change is granted in accordance with 40 CFR §270.72(e) which allows construction to take place as long as it does not constitute reconstruction of the facility.

Please note that this approval does not relieve you of the requirement to comply with regulations of the State of Illinois which apply to the treatment, storage, or disposal of hazardous wastes at your facility.

Please contact Ann Brash, at (312) 886-1476, if you have any questions regarding this matter.

Sincerely,

B.G. Constantelos, Director Waste Management Division

cc: Larry Eastep, IEPA

Continued from page 2. Form Approved OMB No. 158-S80004 NOTE: Photocopy this page before completing if you e more than 26 was 🥶 to list, POR OFFICIAL USE ONL EPA I.D. NUMBER (enter from page 1) DUP 0 5 4 2 6 0 W DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) D. PROCESSES C. UNIT OF MEA-SURE A. EPA HAZARD. Wasteno B. ESTIMATED ANNUAL QUANTITY OF WASTE 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) 1. PROCESS CODES (enter) (enter code) (enter code, 29 27 Commercial off-site incineration 1 pl ol ol 11,200 0 (C.O.S.I.)2 400 DI 01 01 0.4 0 3 35 0 0 Di 4 T 0 7 D 0 0 4 10 K 5 T. 0. 7 0 0 0 5 10 6 D 0 0 6 10 7 D 0 0 80 0 4 8 0 0 8 10 T\_0 9 0 0 9 20 0 Commercial off-site landfill 10 D 0 1 0 0.5 S 0 (C.O.S.L 0 1 1 10 <del>T10</del>1 11 0 0 800 C.O.S.I 12 0 0 600 \_0\_1 C.O.S.I 13 0 0 3 200  $S_0$ C.O.S.I 14 F 0 0 4 400 S 0 1 C.O.S.I 15 F 0 0 5 400 0 C.O.S.1 16 P 0 2 8 0 C.O.S.I 17 P 0 3 0 15 T 0 6 0 18 0 3 15 K T 0 6 T 0 19 P[0]5 3 1 K 0 4 20 P 0 8 440 0 21 5 0.5 0 C.O.S.L RECEIVED 2 22 P 1 0 0.5 K S 0 C.O.S.L. 0 0 U 1 23 1 T 0 6 T 0 7 NOV 1 31984 0 0 2 WMD-RAIU U 80 24 K S 0 1 C.O.S.I. EPA, REGION V 0 0 3 U 25 8 K T 0 6 T 0 7 26 0 40 6 T 0 EPA Form 3510-3 (6-80) CONTINUE ON REVERSE

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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: 5HW-12

Mr. Norman Nachtrieb University Safety Officer Department of Chemistry University of Chicago 5735 South Ellis Chicago, Illinois 60637

Re: Revised Part A Permit Application

University of Chicago

ILD 005421136

Dear Mr. Nachtrieb:

The Part A permit application for the above referenced facility has been amended to incorporate the following changes:

- 1. An increase in design storage capacity (SO1) from 1000 to 2000 liters.
- 2. The reinstatement of the treatment process capacity (TO4), at 24 liters per day.
- The construction of a new building in order to consolidate the facility's waste management activities.

Approval of the first two changes is justified by 40 CFR §270.72(b) and (c). Section 270.72(b) allows for increases in the design capacity of processes when there is a lack of available storage, treatment, or disposal capacity at other waste management facilities. Section 270.72(c) allows the addition of treatment processes when there is a necessity to comply with Federal, State or local regulations. The approval of the third change is granted in accordance with 40 CFR §270.72(e) which allows construction to take place as long as it does not constitute reconstruction of the facility.

Please note that this approval does not relieve you of the requirement to comply with regulations of the State of Illinois which apply to the treatment, storage, or disposal of hazardous wastes at your facility.

Please contact Ann Brash, at (312) 886-1476, if you have any questions regarding this matter.

Sincerely,

B.G. Constantelos, Director Waste Management Division

cc: Larry Eastep, IEPA

Mr. Norman Nachtrieb University Safety Officer Department of Chemistry University of Chicago 5735 South Ellis Chicago, Illinois 60637

> Re: Revised Part A Permit Application University of Chicago ILD 005421136

Dear Mr. Nachtrieb:

The Part A permit application for the above referenced facility has been amended to incorporate the following changes:

- 1. An increase in design storage capacity (SO1) from 1000 to 2000 liters.
- 2. The reinstatement of the treatment process capacity (TO4), at 24 liters per day.
- 3. The construction of a new building in order to consolidate the facility's waste management activities.

Approval of the first two changes is justified by 40 CFR \$270.72(b) and (c). Section 270.72(b) allows for increases in the design capacity of processes when there is a lack of available storage, treatment, or disposal capacity at other waste management facilities. Section 270.72(c) allows the addition of treatment processes when there is a necessity to comply with Federal, State or local regulations. The approval of the third change is granted in accordance with 40 CFR \$270.72(e) which allows construction to take place as long as it does not constitute reconstruction of the facility.

Please note that this approval does not relieve you of the requirement to comply with regulations of the State of Illinois which apply to the treatment, storage, or disposal of hazardous wastes at your facility.

Please contact Ann Brash, at (312) 886-1476, if you have any questions regarding this matter.

Sincerely,

B.G. Constantelos, Director Waste Management Division

cc: Larry Eastep, IEPA

Bcc: R. Stone

AUTHOR STU #1 STU #2 STU #3 TPS INITIALS CHIEF CHIEF CHIEF

# THE UNIVERSITY OF CHICAGO

CHICAGO · ILLINOIS 60637

DEPARTMENT OF CHEMISTRY 5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY • GEORGE HERBERT JONES LABORATORY

SEARLE CHEMISTRY LABORATORY

October 24, 1984

Mr. William L. Miner, Chief Technical, Permits, and Compliance Section Region V, United States Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

Dear Miner:

I should like to thank you for meeting with Mr. Alexander Sharp and me today and for answering our questions concerning the approval by the Environmental Protection Agency of The University of Chicago's Revised Part A Permit Application. We are very pleased that our request has been approved.

Sincerely yours

Norman H. Nachtrieb

Professor of Chemistry, Emeritus University Laboratory Safety Officer

cc: Mr. A. Sharp

NHN:hp

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Amendment of Part A Permit Application University of Chicago Chicago, Illinois

Karl Klepitsch, Chief Waste Management Branch

B.G. Constantelos, Director Waste Management Division

- 1. <u>Background</u>: The University of Chicago is engaged in the treatment and storage of hazardous wastes, and is seeking to incorporate the following changes into its Part A Permit application:
  - a. The addition of design storage capacity due to the lack of sufficient storage capacity at other waste management facilities. The City of Chicago's Fire Protection Bureau had ordered one of the buildings to be closed, thus eliminating some of the facility's storage capacity. The annual generation of wastes for the facility has varied from twelve to seventeen tons, and it is expected to increase.
  - b. The reinstatement of a treatment process (TO4) that had beem temporarily suspended due to the lack of both storage and treatment capacity.
  - c. Construction of a new building in order to consolidate the treatment and storage processes conducted at the facility. This consolidation would reduce the amount of wastes being handled and would increase safety. Presently, wastes are distributed throughout the University's laboratories.
- 2. Part A Changes Requested: Increase the storage design capacity (S01) from 1000 to 2000 liters; reinstate the treatment process capacity (T04) of 24 liters per day; and allow the construction of a new small building to consolidate the facility's waste management activities.
- 3. Results of Proposed Changes: These changes would facilitate the storage and treatment of hazardous wastes. Some of the wastes which are unacceptable for disposal either by incineration or landfilling could be treated and rendered non-hazardous by the facility.
- 4. Does the change constitute reconstruction as defined in 40 CFR §270.72(e)?
  Answer: No.
- 5. Does the facility have interim status? Yes
- 6. Recommendation: I recommend that the above changes be approved.

7. Justification: 40 CFR \$270.72(b) and (c) allow for increases in the design storage and treatment capacity when there is a lack of available storage or treatment capacity at other waste management facilities, and allow the addition of treatment processes in order to comply with local regulations. 40 CFR \$270.72(e) allows construction to take place as long as it does not constitute reconstruction of the facility.

# 8. References:

- (a) EPA identification number: ILD 005421136
- (b) Part A Permit Application

Date: November 19, 1980
Waste Activities: Generator, TSD facility
Design Processes: S01, T01, T03, T04
Estimated Annual Codes: Total of 48 listed wastes

(c) Revised Part A Application

Date: October 2, 1981
Design Processes: S01
Estimated annual codes: Total of 74 listed wastes

TYPIST AUTHOR STU #1 STU #2 STU #3 THS WIND CHIEF CHIE

Mr. Norman Nachtrieb University Safety Officer Department of Chemistry University of Chicago 5735 South Ellis Avenue Chicago, Illinois 60637

Re: Request for Additional Information University of Chicago ILD 005421136

Dear Mr. Nachtrieb:

We have reviewed the revised Part A permit application that you submitted on July 25, 1984. The application proposed the following changes: (1) an increase in storage capacity due to the lack of sufficient storage space at other waste management facilities, (2) the addition of several on-site treatment processes in order to compensate for the shortage of available treatment sites, and (3) the construction of a new building to be used for all waste management activities, thus bringing the facility into compliance with Federal, State and local regulations.

It is the opinion of this office that the first two proposed changes may be justified by 40 CFR §270.72(b) and (c). However, the third change may constitute reconstruction of the facility, as defined by 40 CFR §270.72(e), which is prohibited during interim status. Reconstruction occurs when the capital investment in the changes to the facility exceeds 50% of the cost of an entirely new waste management facility. You stated in a telephone conversation with Ann Brash of my staff that reconstruction of the facility would not take place; however, more information is needed before we can concur with your determination. Specifically, we would like information comparing the costs of your present storage facilities with those of the proposed new building.

Since it appears that the implementation of changes (1) and (2) above depends on the construction of the new building, we are postponing a decision on your revised Part A until we receive the additional information. Feel free to contact Ann Brash of my staff, at (312) 886-1476, if you have any questions on this matter.

Sincerely yours,

William H. Miner, Chief Technical, Permits, and Compliance Section

5HW-12:A.BRASH:fr:9/14/84

INITIALS

TYPIST AUTHOR STU #1 STU #2 STU #3 TPS WMB WMD CHIEF CHI

# THE UNIVERSITY OF CHICAGO

CHICAGO · ILLINOIS 60637

# DEPARTMENT OF CHEMISTRY 5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY • GEORGE HERBERT JONES LABORATORY

SEARLE CHEMICAL LABORATORY

September 13, 1984

Mr. William H. Miner
Waste Management Division 5HW-13
Region V, United State Environmental
Protection Agency
230 South Dearborn Street
Chicago, IL 60604

Ref: Interim USEPA Permit No. ILD 005421136 6, TSD, PA

Dear Mr. Miner:

This is further to my letter to you of July 25, 1984 and the University of Chicago's revised Part A permit application which accompanied it.

Together they described our request to store up to 2,000 liters of chemical waste pending its disposal and our wish to construct a facility for that purpose, including the on-site treatment of small quantities of chemical waste. The latter comprises a very small fraction of the total chemical waste generated in our research and instructional laboratories but which, because of its nature, is inappropriate for incineration or landfill disposal at off-site commercial facilities.

In my judgement, the construction costs of the proposed facility will not exceed fifty percent of the capital value of the facilities we have been using for the interim storage of chemical waste.

Sincerely yours,

Norman H. Nachtrieb

Professor of Chemistry, Emeritus

University Laboratory Safety Officer

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WMD-RATU EPA, REGION V



### THE UNIVERSITY OF CHICAGO

CHICAGO · ILLINOIS 60637

DEPARTMENT OF CHEMISTRY 5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY . GEORGE HERBERT JONES LABORATORY SEARLE CHEMISTRY LABORATORY

July 25, 1984 | DEGELVE JUL 3 0 1984

> WASTE MANAGEMENT BRANCH

Mr. William H. Miner Waste Management Division %HW-13, Region V United States Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

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WMD-RAIU EPA. REGION V

Ref: Interim USEPS Permit No. ILD005421136 G, TSD, PH

Dear Mr. Miner:

This letter accompanies The University of Chicago's submittal of a revised Part A permit application which reflects several changes that have occurred since it received interim status on March 10, 1982. Until very recently we have stored hazardous chemical wastes generated in our research and instructional laboratories in two on-campus sites, pending their removal for off-site disposal by incineration or landfilling in EPA-approved facilities. We have discontinued use of one of these storage sites on the recommendation of the City of Chicago Fire Prevention Bureau. This has necessitated storage of all hazardous chemical waste at the other site, a free standing masonry building that has been upgraded. This is a temporary arrangement and we are requesting approval in the revised Part A permit application to construct a facility on University property that can accept all the hazardous chemical waste generated by our laboratories.

A second consideration that underlies our wish to revise our Part A permit application arises from the experience we have gained over the past 3½ years with our chemical waste streams. Our present interim permit allows us to store up to 1,000 liters of waste, 90% of which is combustible, and is accumulated over a period of about 30 days on the average. Our annual generation of waste has varied from 12 to 17 tons, and appears to be increasing. To cope with delays in the scheduling of transportation and in obtaining approval for the acceptance of waste by incineration and landfill facilities. we seek approval in the revised permit application to store up to 2,000 liters of chemical waste.

A minor but non-negligible percent of our chemical waste (5 - 10%) consists of a great diversity of material, individually small in volume and mass, that we should like to convert into non-hazardous waste or reduce in volume for landfilling by on-site chemical treatment. anticipate that consolidation of such activities in a facility dedicated to this purpose, rather than distributed over many laboratories, will reduce handling hazards and increase the level of safety in our institution. Typical of such wastes are corrosive liquids (acids and bases) that can be readily neutralized; solutions containing toxic metals (Cr(VI), Cd(II), Pb(II), As(III), Ba(II), Hg(I,II), and others) that can be precipitated and reduced in volume for landfilling in an immobilized state: moisture- and air-sensitive materials such as acid anhydrides and acid halides that can be hydrolyzed and neutralized: volatile organometallic compounds such as aluminum alkanes, silanes, and boranes that can be oxidized; alkali and alkaline earth metals such as sodium, potassium, and calcium that can be converted to bases and neutralized; and such toxic substances as osmium tetroxide and hydrazine and its derivatives that are unacceptable for disposal by either incineration or landfilling, but which can be reduced or oxidized to innocuous materials. These are typical, but by no means exhaustive, examples of the kinds of waste materials that present us with great problems for disposal by off-site commercial facilities. In addition, certain wastes are of unknown composition that require analysis before a treatment protocal can be devised.

The third request in our revised Part A permit application is for approval to carry out chemical treatment of the kinds of chemical waste outlined above on a small scale in a laboratory that would be physically attached to the storage facility mentioned in the first paragraph of this letter. These operations would be conducted on a small scale in laboratory beakers and flasks as appropriate and in chemical hoods when required. The Board of Trustees of The University of Chicago has authorized the construction of the dual-purpose facility, and its design would comply with all requirements of the City of Chicago Building Code, its Fire Prevention Bureau, and the Metropolitan Sanitary District.

If approval of this revised Part A permit application is granted by the U.S. EPA, we would propose to obtain building permits from the City of Chicago, with whose Building Department we have already had preliminary discussions, and begin construction and operation of the facility. It would then be our intention to assemble the documentation required for the submittal of Part B of the permit application to the United States Environmental Protection Agency. Our hope and intent is that this facility will serve The University of Chicago's chemical waste disposal responsibilities in a fully satisfactory way, and that it might be a useful model for other colleges and universities to adapt to their needs.

We would greatly appreciate your timely review of our revised Part A permit application and this letter which outlines our plans, so that we may proceed to realize them.

Sincerely yours,

Norman H. Nachtrieb

Professor of Chemistry, Emeritus University Laboratory Safety

Officer

962 - 7094

NHN: hp

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FORM  SEPA  G.S. PRONMENTAL PROTECTION AGENCY HAZARDUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	F ILD 00 5 4 2 1 1 3 6 1
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II. FIRST OR REVISED APPLICATION	
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first revised application. If this is your first application and you already know your facility's EPA I.D. Number, or EPA I.D. Number in Item I above.  A. FIRST APPLICATION (place an "X" below and provide the appropriate date)	application you are submitting for your facility of a ref this is a revised application, enter your facility's
1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)  YR. MO. DAY FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)	2. NEW FACILITY (Complete Item below.)  71 FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERA- TION BEGAN OR 15 TO BEGAN OR 15 23 74 75 76 77 78
B. REVISED APPLICATION (place an "X" below and complete Item I above)	
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III. PROCESSES – CODES AND DESIGN CAPACITIES	
<ul> <li>A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used describe the process (including its design capacity) in the space provided on the form (Item III-C).</li> <li>B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.         <ol> <li>AMOUNT — Enter the amount.</li> <li>UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure used. Only the units of measure that are listed below should be used.</li> </ol> </li> <li>PRO- APPROPRIATE UNITS OF</li> </ul>	measure codes below that describes the unit of
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- C. SPACE FOR ADDITIONAL PROCESS CODES OF FOR DESCRIBING OTHER PROCESSES (code "T04"), FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.
- TO4 Neutralization of acids and bases. 1 liter batch process in open vessels (glass, stain-less steel, or polypropylene)
- Hydrolysis, with neutralization, of organic acid chlorides and anhydrides and nitriles, and anhydrous inorganic chloride salts in open glass or stainless steel beakers or in condenser-equipped 3-neck flasks of 1-liter capacity.
- Oxidation of organic compounds with H<sub>2</sub>SO<sub>4</sub>/K<sub>2</sub>Cr<sub>2</sub>O<sub>7</sub>: hydrazines, amides, and cyanides with alkaline hypochlorite in 1-liter glass 3-neck flasks.
- TO7 Precipitation and filtration of toxic metals as insoluble compounds, following reduction to lower oxidation states, if required, in open glass vessels of 1-liter capacity; residue to landfill.
- TO8 Dissolution of alkali and alkaline earth metals in alcohols or dilute acids on a 1-gram scale.
- TO9 Recovery for re-use, by distillation on 100 gram scale (ESP. mercury)

(SEE APPENDIX A)

### IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
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If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

- 1. PROCESS CODES:
  - For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.
- NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:
  - 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat store, and/or dispose of the waste.
  - quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

    2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
  - 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV** (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

		A,	EP	A RD	T			UNIT				D. PROCESSES							D. PROCESSES			
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NOTE: Photocopy this page before completing if y Form Approved OMB No. 158-\$80004 ave more than 26 wastes to list. FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page I) 0 DUP Ι Il D 2 W DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA-SURE (enter code) D. PROCESSES A. EPA HAZARD. WASTE NO B. ESTIMATED ANNUAL QUANTITY OF WASTE 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) 1. PROCESS CODES (enter) (enter code) 29 | 27 -36 Commercial off-site incin-D olo 11,200 eration (C.O.S.I.) 00 D 2 400 2 T 0 5 T 0 7 0 4 00 3 D 35 3 T08 K T0 T06 T07 4 T07 00 4 D 10 T07 olo 10 D 6 T07 D olo 6 10 7 T. T04 T07 00 7 80 D 8 L 00 8 T07 D 10 9 olo L T07 D 9 20 501 Commercial off-site land-K 01 0.5 D 0 10 fill (C.O.S.L.) 011 10 T07 11 L S01 C.O.S.I. 00 800 12 F L 00 600 S01 C.O.S.I. 2 13 00 F 3 200 L S01 C.O.S.I. 14 F olo 4 400 S01 C.O.S.I. 15 F 00 400 5 L S01 C.O.S.I. 16 P 8 0|2 2 L S01 C.O.S.I. 17 Ρ 0|3 15 L T06 T07 0 18 Р 0|3 2 15 L T06 T07 19 Р 05 1 3 T04 K 20 Ρ 08 7 40 <u> 707</u> 21 P 1|1 5 0.5 S01 C.O.S.L. 22 K P 12 S01 C.O.S.L. Ю 0.5 23 U 00 1 K T06 T07 24 U 00 80 2 S01 C.O.S.I. 8 25 U 0 0 L T06 T07 26 T06 T07 40 EPA Form 3510-3 (6-80) **CONTINUE ON REVERSE** Α U 0 0 9

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IV. DESCRIPTION OF HAZARDOUS WAST	ontinued)				
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V. FACILITY DRAWING					
All existing facilities must include in the space provided on	page 5 a scale d	rawing of the facility (see instruction	ns for more de	tail).	
VI. PHOTOGRAPHS					
All existing facilities must include photographs (aeri					je,
treatment and disposal areas; and sites of future stor	rage, treatmen	t or disposal areas (see instruct	ions for more	detail).	
VII. FACILITY GEOGRAPHIC LOCATION					
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VIII. FACILITY OWNER			<del> </del>		,
A. If the facility owner is also the facility operator as I	listed in Section	VIII on Form 1, "General Informa	tion", place an	"X" in the box to the I	eft and
skip to Section IX below.	2				
B. If the facility owner is not the facility operator as l	isted in Section	VIII on Form 1, complete the following	owing items:		
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1. NAME OF FACIL	ITY'S LEGAL	OWNER		2. PHONE NO. (area	code & no.)
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15 116					62 -
3. STREET OR P.O. BOX		4. CITY OR TOWN	5. S	T. 6, ZIP CO	DE
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18 / 16	45 15 16	CITCAGO	40 41		-51
IX. OWNER CERTIFICATION					
I certify under penalty of law that I have personally	examined and	am familiar with the informat	ion submitted	in this and all attaci	hed
documents, and that based on my inquiry of those in					
submitted information is true, accurate, and complete	te. I am aware	that there are significant penal	ities for subm	itting taise intormati	on,
including the possibility of fine and imprisonment.					
A. NAME (print or type)	B. SAGNATUR	_	c.	DATE SIGNED	
Arthur M. Sussman	lito	Mr. Susomer	- 1	July 27, 1984	
Vice President	+ww.	Sussme		- 3.5 - 2.5 1504	
X, OPERATOR CERTIFICATION					
I certify under penalty of law that I have personally	examined and	am familiar with the informat	ion submitted	in this and all attack	hed
documents, and that based on my inquiry of those in	ndividuals imm	nediately responsible for obtain	ing the inform	nation, I believe that	t the
submitted information is true, accurate, and complete	te. I am aware	that there are significant penal	ties for subm	itting false informati	on,
including the possibility of fine and imprisonment.		: '			
A. NAME (print or type)	B. SIGNATUR	RE , )	c.	DATE SIGNED	
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EPA Form 3510-3 (6-80)

PAGE 4 OF 5

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A Form 3510-3 (6-80)

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PAGE 4 OF 5

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### V. FACILITY DRAWING (see page 4)

### APPENDIX A

### Waste Handling and Treatment Plan

The research and instructional laboratories of The University of Chicago annually generate between 12 and 17 tons of chemical waste. More than 90% of this material is currently transported to an EPA-approved commercial incinerator for destruction, while less than a year ago it was consigned to an out-of-state EPA-approved landfill for disposal. The remaining 10% consists of acids and bases and a wide variety of materials whose reactivity or toxic properties rule out their disposal by incineration.

The waste is received from individual laboratories where it is generated in a variety of types of containers: 5 gallon metal cans and screw cap glass or plastic bottles of l gallon or smaller capacity. Each container carries a tag or label that identifies its contents and point of origin; such information is entered into a log book. Waste is classified on receipt into one of four categories: corrosive (acidic or alkaline), flammable, air-or moisture-reactive, or toxic. Compatible wastes are stored in OSHA/NFPA-approved cabinets.

The first category of waste, comprising 90% of the total, includes spent organic solvents (typically toluene, xylene, benzene and their mixtures) used vacuum pump oil, a variety of organic liquid mixtures (e.g., alcohols, aldehydes, ketones, tetrahydrofuran, and chlorinated hydrocarbons) and minor quantities of combustible solids. All of these may be safely and totally destroyed by incineration by an EPA-licensed commercial incinerator under conditions that are approved and regulated by that agency. At the present time such wastes are transported under manifest by a D.O.T.-licensed hazardous waste transport company to the SCA Chemical Services, Inc. commercial chemical waste incinerator facility at 11700 S. Stony Island Avenue, Chicago, Illinois. Other EPA-approved commercial incinerators may be used in the future.

In the new University Laboratory Service Building to be constructed on a site adjoining its Steam Plant, the wastes will be segregated and stored in OSHA-NFPA-approved cabinets and logged into the master waste record. Compatible organic flammable wastes will be transferred from the small (≤5 gallon) containers in which they are received into 55 gallon drums. Such transfer operations will be carried out in the storage area under an exhaust canopy, and the drums will be sealed, checked for leaks, and stored pending transport to the incinerator. The quantity of waste stored will not exceed 400 gallons nor stored for more than 90 days.

### Treatment Operations

The second category of waste, comprising 10% of the total, cannot be destroyed by incineration methods. Formerly, most of it was consigned under manifest to an out-of-state EPA-licensed landfill site for disposal. Such waste is typically corrosive aqueous solutions and aqueous solutions or solids containing toxic metals (e.g., chromium, cadmium, arsenic, mercury, barium, lead, silver, and selenium). A minor, but significant, fraction of the waste in the second category is not acceptable in landfills. It includes waste that is reactive on exposure to air or moisture (e.g., sodium, lithium, and potassium metals, acidic anhydrides such as phosphorous pentoxide, acyl chlorides such as acetyl chloride and benzene sulfonylchloride, anhydrous titanium tetrachloride, sulfuryl chloride, and such organometallics as triethyl aluminum and silanes). In general, the procedures outlined in the National Academy of Sciences book, "Prudent Practices for Disposal of Chemical

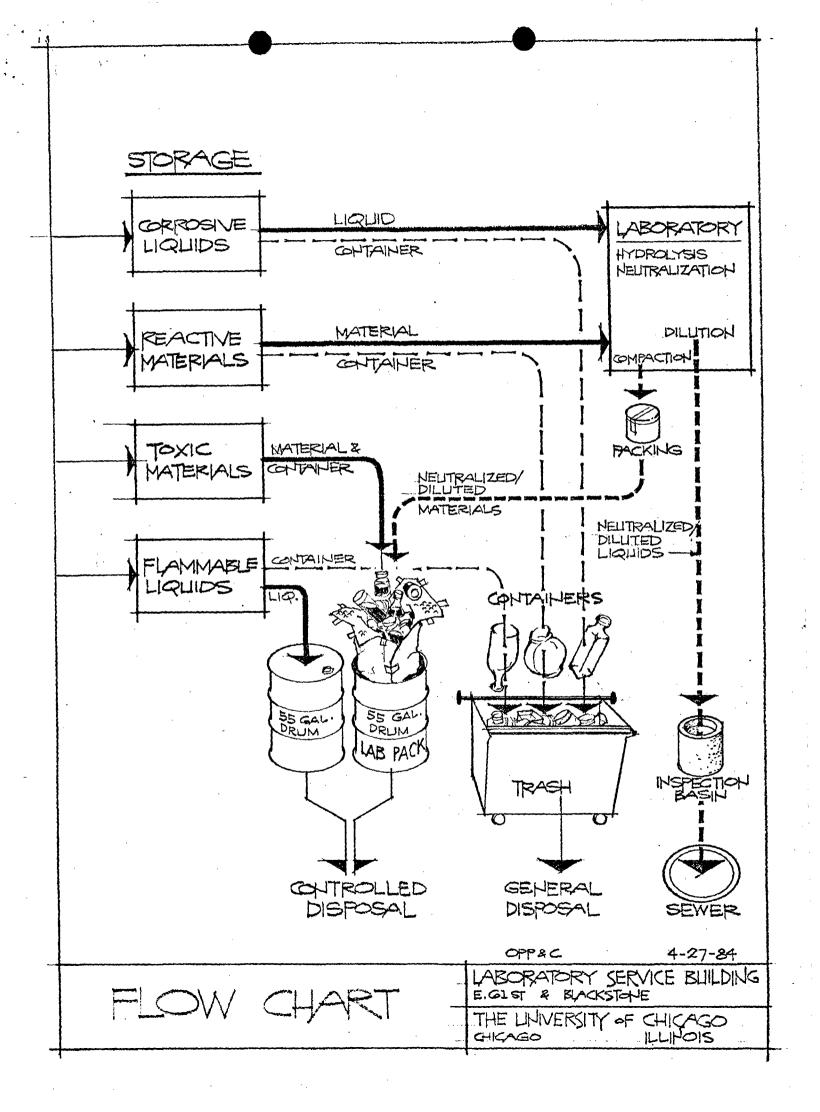
### V. FACILITY DRAWING (see page 4)

from Laboratories" will be employed.

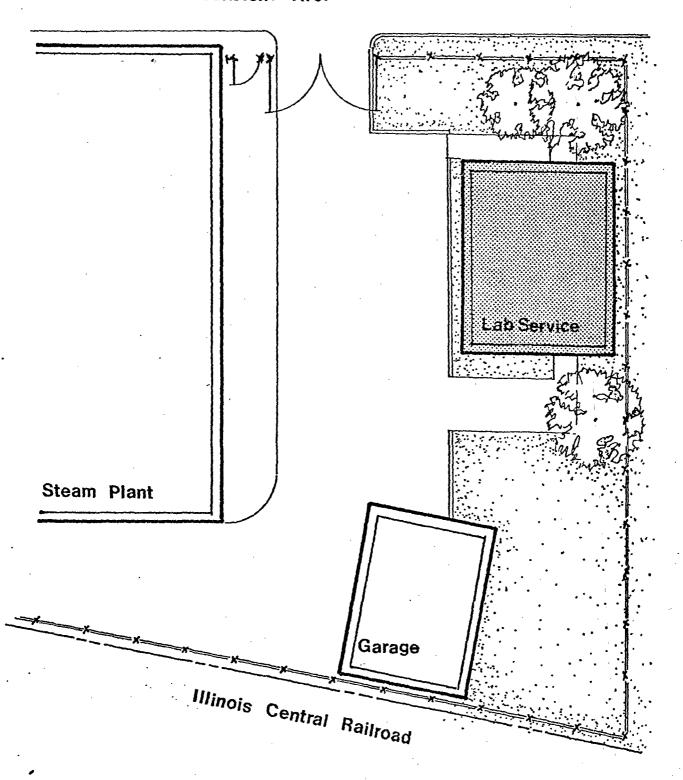
Most of the wastein the second category will be converted into innocuous materials by chemical treatment processes. The products of chemical treatment will typically be neutral aqueous solutions of non-toxic salts that may be safely and legally flushed into the sanitary sewerage system with copious quantities of water.

The chemical treatment processes to be used will be: neutralization of acids and bases, hydrolysis of acid anhydrides, acyl chlorides, and such compounds as titanium tetrachloride and sulfuryl chloride followed by neutralization, decomposition of alkali metals, and wet oxidation by means of sulfuric acid dichromate or hypochlorite solutions. Such operations will be carried out on a small scale in a chemical fune hood, by or under the direct supervision of a Ph.D. chemist. All waste that contains toxic metals will be treated by methods that lead to their separation as insoluble compounds, and these materials will be lab-packed for landfill disposal.

These procedures will reduce the volume of hazardous waste generated by the research and instructional laboratories to harmless materials that have no adverse consequences to humans or the environment. The quantity of waste that must be landfilled will be reduced to a very small fraction of the total.



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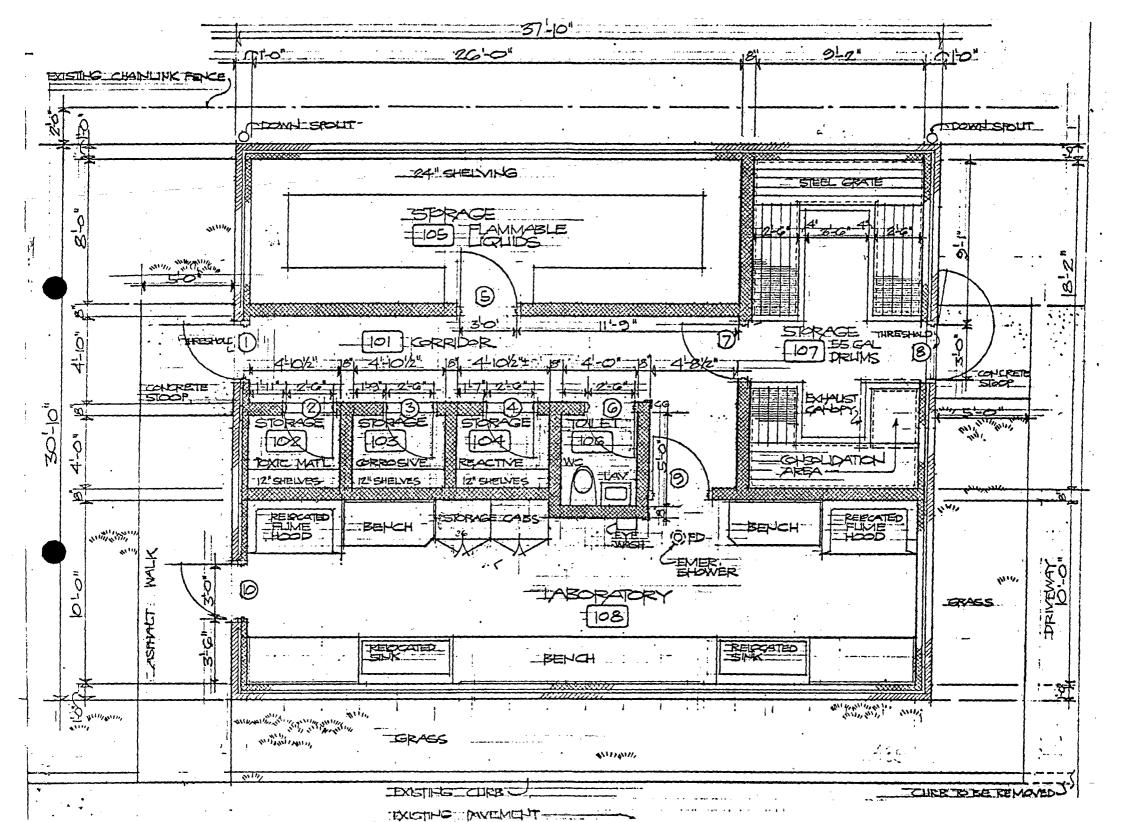




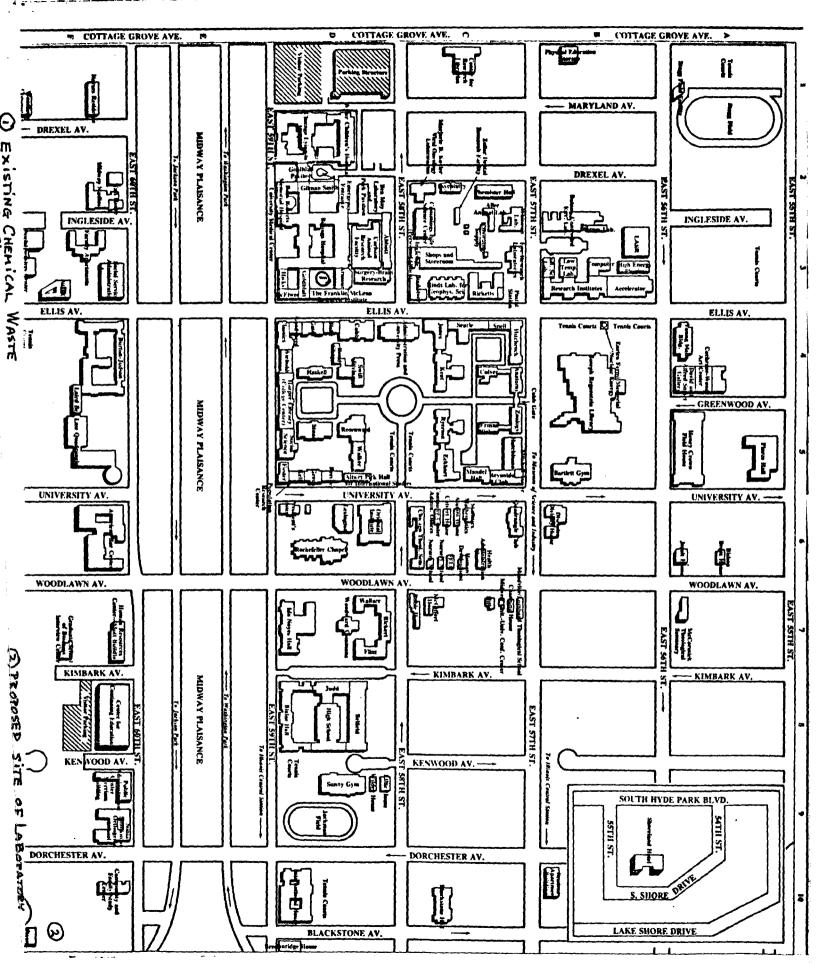
### Laboratory Service Building

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THE UNIVERSITY OF CHICAGO
OFFICE OF THE ASSISTANT VICE-PRESIDENT
PHYSICAL PLANNING



## THE UNIVERSITY OF CHICAGO



THE UNIVERSITY OF CHICAGO

CHICAGO · ILLINOIS 60637

DEPARTMENT OF CHEMISTRY

5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY • GEORGE HERBERT JONES LABORATORY

SEARLE CHEMISTRY LABORATORY

October 2, 1981

RCRA Activities U.S. Environmental Protection Agency P.O. Box A3587 Chicago, Illinois 60690-3587

Ref: Form 3510-3

I.D. #ILT180019838 ox ILD 005421136

Dear Sirs:

Since November 19, 1980 The University of Chicago has disposed of all of its hazardous chemical wastes by employing a licensed commercial company for packaging the waste in drums and transporting it to an EPA-approved landfill site for burial. We have not made use of incineration or any other treatment processes during this period, although consideration is being given to such alternatives to landfilling in the future.

We shall of course consult the Environmental Protection Agency and seek its approval before undertaking any alternative to the burial of hazardous chemical wastes in an approved site. For the present and forseeable future, our Process Code should be SO1.

Sincerely yours.

Norman H. Nachtrieb University Laboratory

Trouman H. Hacktriel

Safety Officer

NHN: hp

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DECENTED 10-6

Please print or type in the unshaded areas only (fills in areas are spaced for elite type, i.e., 12 characters linch	J.		•	Form Approved	OMB No. 158-	R0175	300
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G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		Х	H, Do you or will you cial processes such process, solution m tion of foreit fuel; .	inject at this facility fi as mining of aulfur by Ining of minerals, in a or recovery of geother	the Frasch Nu combus	X	
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The University of Chicago is an education	al institution, operating a university,
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or physicians and the treatment or patron	•••
NAME & OFFICIAL TITLE (type or print)  B. SIGNA	
Arthur M. Sussman - Vice President	lulu Susman Nov. 19, 1980

### ATTACHMENT

FORM 3510-1 (X) Existing Environmental Permits Additional Illinois E.P.A. Incinerator Permits

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C. SPACE FOR ADDITIONAL PROCESS CODES ON FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE & INCLUDE DESIGN CAPACITY.

T 0 4 - Distillation for recovery of valuable solvents and mercury

DESCRIPTION		

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle, If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code, Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### PROCESSES

1. PROCESS CODES:

For listed hezardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item 111 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Selections of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

  2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated

1		A. EPA		A.		C. UNIT			D. PROCESSES								
Z OZ	HAZARD. WASTENO (enter code)		NO			OF MEA- SURE (enter code)		1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))	
X-1	K	0	5	4	900		P	T	0	3	D	8 (	0	1 1			
X-2	D	0	0	2	400		P	T	0	3	D	8	0	1 1		T	
X-3	D	0	0	1	100		P	T	0	3	D	8	0	<del>- 1 - 1</del>	1	1	
<b>X-4</b>	D	0	0	2										- 1 1		1	included with above

FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page 1) DUP 36 W DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA SURE (enter code) D. PROCESSES A. EPA HAZARD. WASTENO B. ESTIMATED ANNUAL QUANTITY OF WASTE 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) 1. PROCESS CODES (enter) (enter code) 29 27 29 27 36 S'O'ILTO'I DID 0 2 400 K 2 T 0 3 S 0 1 750 + 17K plolola 3 T 0 3 S 0 1 K 00003 20 4 S 0 1 D O 0 5 10 5 K S 0 1 6 6 D 0 0 6 110 S 0 1 0 0 7 D INCLUDED WITH ABOVE NO. 6 0002 S 0 1 0 9 28 K D 0 K T 0 1 S 0 1 DI 0 1/1 6 4 T 0 3 S 0 1 D 0 1 3 10 0 0 0 K T 0 1 S 0 1 INCLUDED WITH ABOVE 4 20 11 S 0 1 0 D 116 10 T 0 11 0 INCLUDED WITH ABOVE P 3 | 5 13 U 0 0 2 120 T 0 3 S 0 1 14 U 0 0 9 K T 0 1 S 0 1 5 K 0 1 2 INCLUDED WITH ABOVE T 0 3 S 0 1 16 0 9 K 1 160 A 46 0 INCLUDED WITH ABOVE 0|1 18 U 2 1 1 25 K S 0 1 A/8 KI O 2 1 INCLUDED WITH ABOVE 20 S 0 1 U 0 4 4 130 K T 0 3 0 0 9 K INCLUDED WITH ABOVE S 0 1 22 0 8 0 U 360 T 0 3 2 U 1 1 T 0 3 S 0 1 23 150 U 1 5 4 K T 0 3 S 0 1 24 100 1 6 8 2 T 0 3 S 0 1 25 3 S o 26 2 1 9 6

EPA Form 3510-3 (6-80)

Form Approved OMB No. 158-\$20004

EPA L.D. NUMBER (enter from page 1) DUP W DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA-SURE (enter code) D. PROCESSES A. EPA HAZARD. WASTENO B. ESTIMATED ANNUAL QUANTITY OF WASTE 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) 1. PROCESS CODES (enter) (enter code) 36 K Ö 3 S 0 1 6 1 U 1 9 6 S 0 1 T 0 3 10 2 13 11 3 K T 0 3 S 0 1 120 2 2 U 4 S 0 1 10 1 11 5 S 0 1 1 K lo 10 6 2 S 0 1 P 10 13 7 2 K S 0 1 U 1 4 4 K S 0 1 8 U 10 16 9 100 2 K T 0 3 IS 0 1 9. U 9 K 2 T 0 1 S 0 1 P 10 0 3 2 K T 0 1 S 0 1 2 P 10 13 11 2 K S 0 1 0 5 12 K T 0 1 S 0 1 0 3 4 13. 4 K T 0 3 S 0 1 14 U 2 3 9 150 K T 0 3 S 0 1 2 15 U 1 8 8 T 0 3 S 0 1 K 20 0 16 U 1 8 K T 0 3 S 0 1 U | 2 1 2 7 13 T'0'3|S'0'T K 5 50 U 0 6 8 s'0'1 K 8 15 P 0 T'0'3|S'0'1 K 2 2 U 0 1 5 0 1 K P 0 9 2 10 s'01 K F 0 0 11 18 T'0'3|S'0'1 K U 1 2 2 16 T 0 3 S 0 1 U 5 19 10 K 1 T 0 3 S 0 1 5 K 0 10 2 'n 2 K m 3510-3 (6-80) CONTINUE ON REVERSE

have more than 26 wastes to list.

FOR OFFICIAL USE ONLY

ontinued from page 2.

IOTE: Photocopy this page before completing if y

Continued from page 2. Farm Approved OMB No. 158-\$80004 NOTE: Photocopy this page before completing if you have more than 26 wastes to list. FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page 1) DUP DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA SURE (enter code) D. PROCESSES A. EPA HAZARD. WASTENO B. ESTIMATED ANNUAL QUANTITY OF WASTE 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) Z o (enter code) 0 3 K S 0 1 9 1 P 10 18 8 2 T 0 3 S 0 1 80 5 3 K T 0 3 S 0 1 0 0 0 2 20 4 5 U 2 2 8 K T 0 3 IS 0 1 22 6 8 2 K T 0 3 ull 8 S 0 1 7 2 T 0 3 S 0 1 P 0 8 9 2 T 0 3 S 0 1 6 9 2 3 2 K T 0 3 S 0 1 K S 0 1 T 0 3 30 .10 U T 0 3 K S 0 1 0 12 11 U 3 12 P 0 1 13 10 3 1 3 U 2 1 1 0 3 0 1 U II 16 1 0 3 S 0 1 lu 0 2 1 0 3 S 0 1 ln. 5 3 T 0 0 1 8 U 10 ] 0 3 0 1 1 U 10 15 2 D 0 0 2 D 0 0 40 0

n 3510-3 (6-80)

### THE UNIVERSITY OF CHICAGO

5801 ELLIS AVENUE
CHICAGO · ILLINOIS 60637

Office of Legal Counsel

(312) 753- 4001

November 19, 1980

EPA Region V RCRA Activities P.O. Box 7861 Chicago, Illinois 60680

Re: Application for Hazardous Waste Permit

1.10. # 147 180019838 1LD005421136

Gentlemen:

There is enclosed herewith EPA forms 3510-1 and 3510-3 of the Consolidated Permit Application for The University of Chicago which is filed herewith pursuant to the requirements of the Resource, Conservation and Recovery Act, 42 U.S.C. 6901. The University previously on August 18, 1980 registered as a generator of waste with the EPA by filing form 8700-12 but, to date, has not yet received its identification number and said number has, therefore, not been recorded in the enclosed application.

The University of Chicago is an educational institutution, operating a university, including a college, graduate departments, professional schools, libraries, a press, educational and research departments, including The Pritzker School of Medicine and the University of Chicago Hospitals and Clinics for the training of physicians and the treatment of patients. These activities are in the main carried out at its main campus on the south side of Chicago which is the site for which the Consolidated Permit is submitted.

The University also has separate facilities located one block south of its main site, (Power Plant), at 5020 S. Cornell Avenue, (University Press) and at Williams Bay, Wisconsin (Yerkes Observatory). While some hazardous waste may be generated at these separate sites, the amounts are such that each of these separate sites may be best described as small generators of hazardous materials which are not required to be registered with EPA.

Please acknowledge receipt of the application on the carbon copy of this letter enclosed herewith and return same to me.

Very truly yours.

Arthur M. Sussman

Vice President

AMS/jb Encl. 5801 ELLIS AVENUE
CHICAGO · ILLINOIS 60637

Office of Legal Counsel

(312) 753- 4001

November 19, 1980

EPA Region V RCRA Activities P.O. Box 7861 Chicago, Illinois 60680

Re: Application for Hazardous Waste Permit

Gentlemen:

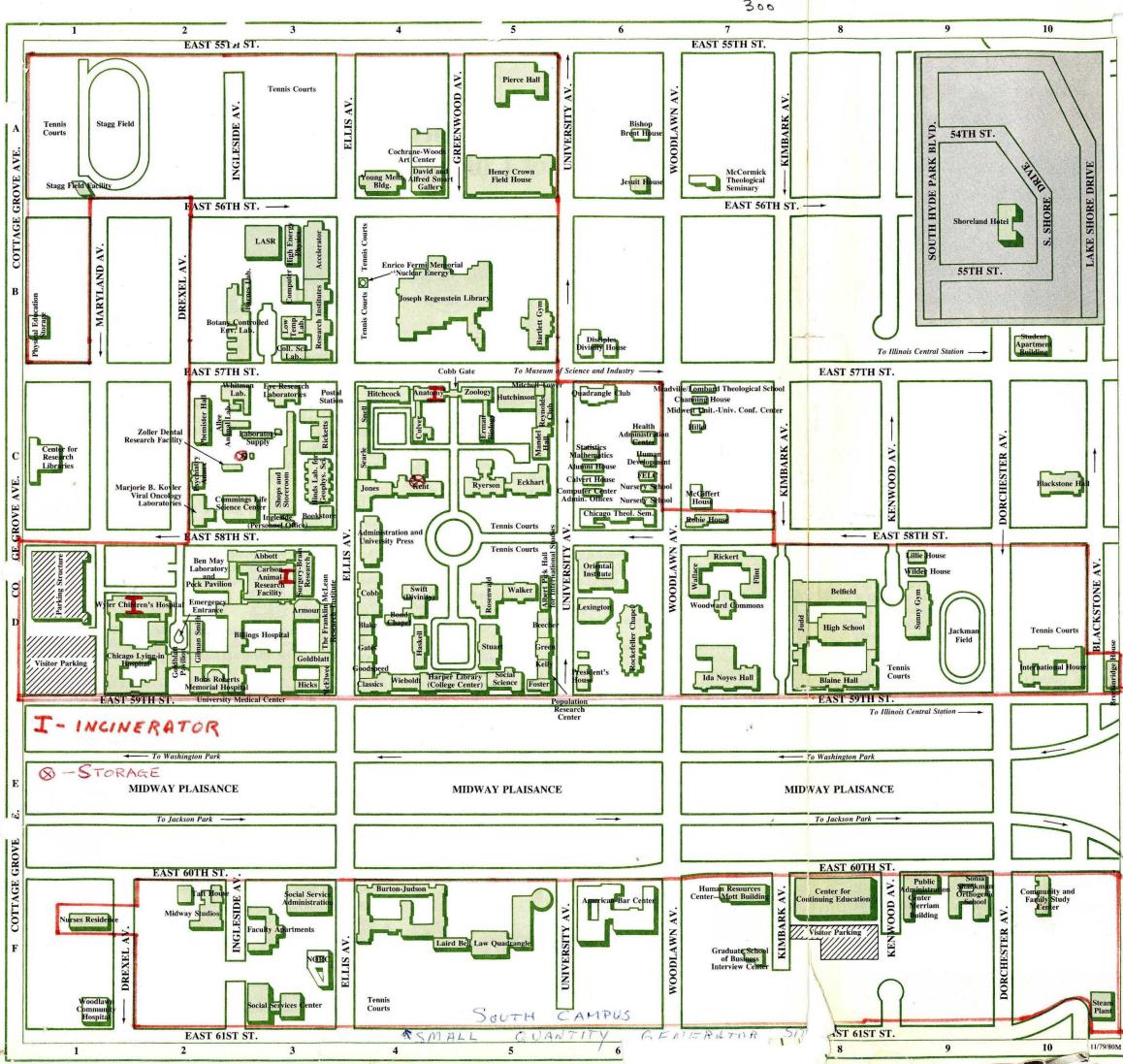
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Please acknowledge receipt of the application on the carbon copy of this letter enclosed herewith and return same to me.

	Very truly yours,	
•		Date
	Arthur M. Sussman Vice President	I acknowledge receipt of the enclosures as listed above.
AMS/jb Encl.		Signature





With space for 3.5 million volumes, the Joseph Regenstein Library is one of the largest academic libraries in the country.

Abbott Memorial Hall (D-2 and D-3) Abbott Memorial Hall (D-2 and D-3)
Accelerator Building (B-3)
Administration Building (C-4 and D-4)
Allee Laboratory of Animal Behavior (C-2 and C-3)
Alumni House (C-6)
American Bar Center (F-6)
Anatomy Building (C-4)
Armour Clinical Research Building (D-3)
Barnes Laboratory (B-2 and B-3)
Bartlett Gymnasium (B-5)
Becher Hall (D-5)
Belfield Hall (D-8)
Laird Bell Law Quadrangle (F-4 and F-5)
Billings Hospital (D-2 and D-3)
Blackstone Hall (C-10)
Blaine Hall (D-4)
Blake Hall (D-4)
Bond Chapel (D-4) Blake Hall (D-4)
Bond Chapel (D-4)
Bookstore (C-3)
Botany Controlled Environment Laboratory (B-2 and B-3)
Breckinridge House (D-10)
Bishop Brent House (A-6)
Burton-Judson Courts (F-4)
Calvert House (C-6)
A. J. Carlson Animal Research Facility (D-2 and D-3)
Center for Continuing Education (F-8)
Center For Research Libraries (C-1)
Channing House (C-7) Center for Continuing Education (F-8)
Center For Research Libraries (C-1)
Channing House (C-7)
Chicago Lying-in Hospital (D-1 and D-2)
Chicago Theological Seminary (C-6)
Classics Building (D-4)
Cobb Lecture Hall (D-4)
Cochrane-Woods Art Center (A-4)
College Science Laboratories (B-3)
Community and Family Study Center (F-10)
Computer Building (B-3)
Computer Building (B-3)
Computer Center Administration Offices (C-6)
Henry Crown Field House (A-5)
Culver Hall (C-4)
Cummings Life Science Center (C-2 and C-3)
Disciples Divinity House (B-6)
Eckhart Hall (C-5)
Erman Biology Center (C-5)
Eye Research Laboratories (C-3)
Faculty Apartments (F-3)
Far Eastern Languages and Civilizations (FELC) (C-6)
Enrico Fermi Memorial (B-4)
Filint House (D-7) Flint House (D-7) Foster Hall (D-5) Gates Hall (D-4) Gates Hall (D-4)
Goldblatt Memorial Hospital (D-3)
Goldblatt Pavilion (D-2)
Goodspeed Hall (D-4)
Graduate School of Business Interview Center (F-7)
Green Hall (D-5)
Harper Memorial Library (College Center) (D-4 and D-5)
Haskell Hall (D-4)
Health Administration Center (C-6)
Hicks Memorial Hospital (D-3)
High Energy Physics Building (B-3)
High School (D-8)
Hillel Foundation (C-7)
Hinds Laboratory for the Geophysical Sciences (C-3)
Hitchcock Hall (C-4)
Human Development (C-6) Health Administration Center (C-6)
Hicks Memorial Hospital (D-3)
High Energy Physics Building (B-3)
High School (D-8)
Hille Foundation (C-7)
Hinds Laboratory for the Geophysical Sciences (C-3)
Hitchcock Hall (C-4)
Human Development (C-6)
Human Resources Center—Mott Building (F-7)
Ingleside Hall (C-3)
International House (D-10)
Jackman Field (D-9)
Jesuit House (A-6)
Jones Laboratory (C-4)
Judd Hall (D-8)
Kent Chemical Laboratory (C-4)
Marjorie B. Kovler Viral Oncology Laboratories (C-2)
Laboratory for Astrophysics and Space Research (LASR) (B-3)
Lexington Hall (D-6)

Steam Plant (F-10)
Student Apartment Building (B-10)
Sunry Gymnasium (D-9)
Surgery-Brain Research Pavilion (D-3)
Swift Hall (D-4)
Taft House (F-2 and F-3)
Tennis Courst (A-1, 3; B-4; C-5; D-5, 9, 10; F-4)
University Press (Administration Building) (C-4 and D-4)
Walker Museum (D-5)
Wallace House (D-7)
Whitman Laboratory (C-2 and C-3)
Wieboldt Hall (D-4)
Wilder House (D-9)
Woodlawn Community Hospital (F-1)
Woodward Commons (D-7)
Wyoung Memorial Building (A-4)
Zoller Dental Research Facility (C-2 and C-3)
Zoology Building (C-5)

Lillie House (D-9)
Laboratory Supply (C-2 and C-3)
Low Temperature Laboratory (B-3)
Mandel Hall (C-5) Low Temperature Laboratory (B-3)
Mandel Hall (C-5)
Ben May Laboratory (D-2)
McCormick Theological Seminary (A-7)
McElwee Memorial Hospital (D-3)
McGiffert House (C-7)
The Franklin McLean Research Institute (D-3)
Meadwille/Lombard Theological School (C-7)
Medical Center (D-1 to D-3)
Midway Studios (F-2)
Midwest Unitarian-Universalist Conference Center (C-7)
Mitchell Tower (C-5)
Ida Noyes Hall (D-7)
"Nuclear Energy." Enrico Fermi Memorial (B-4)
Nursery School (C-6)
Nurses' Residence (F-1)
Oriental Institute (D-6) Oriental Institute (D-6)
Parking (D-1 and F-8)
Parking Structure (D-1)
Peck Pavilion (D-2)
Personnel Office (C-3)
Phemister Hall (C-2) Personnel Office (C-3)
Phemister Hall (C-2)
Physical Education Storage (B-1)
Albert Pick Hall for International Studies (D-5)
Pierce Hall (A-5)
Population Research Center (D-5)
Postal Station (C-3)
President's House (D-6)
Psychiatry Annex (C-2)
Public Administration Center—Merriam Building (F-9)
Quadrangle Club (C-6)
Oseph Regenstein Library (B-4 and B-5)
Research Institutes Building (B-3)
Reynolds Club (C-5)
Rickett House (D-7)
Ricketts Laboratory (C-3)
Bobs Roberts Memorial Hospital (D-2)
Robie House (C-7)
Rockefeller Memorial Chapel (D-6)
Rosenwald Hall (D-5)
Ryerson Physical Laboratory (C-4)
Sonia Shankman Orthogenic School (F-9)
Shops and Storeroom (C-3)
Shoreland Hotel (B-10)
David and Alfred Smart Gallery (A-4)
Charles Gilman Smith Hospital (D-2)
Snell Hall (C-4)
Social Scrices Research Building (D-5)
Social Services Center (F-3)
Stagg Field (A-1)
Stagg Field (A-1) Stagg Field (A-1)
Stagg Field Facility (A-1)
Statistics-Mathematics (C-6) Steam Plant (F-10) Stuart Hall (D-5)

### Fire and Police: 753-2211

Campus Security will respond to calls to the general security number, and all fire calls should be made to the same number. In addition, there are many white campus security phones throughout and around the campus; they are connected directly to the security switchboard.



No

#### OFFICE OF LEGAL COUNSEL

5801 ELLIS AVENUE CRICAGO · ILLINOIS 60637

4001

November 19, 1980-

EPA Region V RCRA Activities P.O.:Box 7861 Chicago, Illinois 60680

Re: Application for Hazardous Waste Permit

1D= ILTISCC17838

Gentlemen:

There is enclosed herewith EPA forms 3510-1 and 3510-3 of the Consolidated Permit Application for The University of Chicago which is filed herewith pursuant to the requirements of the Resource, Conservation and Recovery Act, 42 U.S.C. 6901. The University previously on August 18, 1930 registered as a generator of waste with the EPA by filing form 8700-12 but, to date, has not yet received its identification number and said number has, therefore, not been recorded in the enclosed application.

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Please acknowledge receipt of the application on the carbon copy of this letter enclosed herewith and return same to me.

Very truly yours,

Arthur M. Sussman Vice President

AMS/jb Encl.

cc: Alfred C. Herbster



tram boenitals veterinary

IX. DESCRIPTION OF	F HAZARDOUS WAST	ES (continued from )	ront)	Property states		
A. HAZARDOUS WASTE	S FROM NON—SPECIFIC fic sources your installation	SOURCES. Enter the handles. Use additiona	four—digit number from I sheets if necessary.	40 CFR Part 261.31 for	each listed hazardous	
1	2	3	4	5	6	-1
Paoi						
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 25	>
Hit	<del>                                     </del>	<del>                                      </del>	-	Hil		DET
23 - 26	23 2 26	23 - 26	23 - 25	23 - 26	23 - 26	ACT
	S FROM SPECIFIC SOUR			R Part 261.32 for each I	isted hazardous waste fro	m 🗲
13	14	15	16	17	18	
K012	K009					
23 - 26	23 - 28	23 - 26	23 - 26	23 - 26 23	23 <u>- 26</u>	
K101011				<del>                                    </del>		
23 - 26	23 - 26	23 - 26	23 26	23 - 26	23 - 25	
25	26	27	28	29	30	
1301XI	23 - 25	23 - 26	23 26	23 26	23 26	
	MICAL PRODUCT HAZAF				13 for each chemical sub-	
31	32	33	34	35	36	-
P1317	11019	UURU	4/16/8	U21/12	P030	
23 26	23 - 26	23 26	23 - 26	23 26	23 - 26	
37	38	39	1///	1/12/212	42	
23 26	23 - 25	23 25	23 26	13 4 7 0 E	0 1 9 9	
43	44	45	46	47	48	
4000	V044	459	4196	00/3	0069	
D. LISTED INFECTIOUS	S WASTES. Enter the fou	r-digit number from 40	CFR Part 261.34 for ea	ch listed hazardous wast	e from hospitals, veterina	ry
nospitals, medical and	research laboratories your	installation nancies. Us	e additional sheets if ne	cessary.	54	
E. CHARACTERISTICS	OF NON-LISTED HAZA	RDOUS WASTES. Mar	k "X" in the boxes corre	esponding to the charact	eristics of non-listed	
hazardous wastes your	r installation handles. <i>(See</i>	40 CFR Parts 261.21 -	261.24.}			
X1. IGNIT (D001)	TABLE √(d	X2. CORROSIVE	(5003)	CTIVE	24. TOXIC	
X. CERTIFICATION						>
I certify under pena	alty of law that I have	personally examined	and am familiar wit	th the information su	bmitted in this and a	u n
I believe that the su	, and that based on my bmitted information is	true, accurate, and o	omplete. I am aware	e that there are signif	icant penalties for sub	TACH A
GNATURE GNATURE	ntion, including the poss		prisonment. Ficial title (type or	NOV 24 K	DATE SIGNED	
fann.	en l'i Bur	1 rote		printy	11/14/00	,
pujin	) DEVEDOR	1	)		1////	
COMMERCIAL CHE	MICAL PRODUCT HAZA	DDOUG WASTER F.A.		1 40 CED Com 904	22 for each chamical rub	
stance your installation	MICAL PRODUCT HAZA On handles which may be a	hazardous waste. Use a	r the tour—aight numbe additional sheets if neces	r from 40 CFR Part 261.	33 for each chemical sub-	
31	32	33	34	35	36	
1/11/917	P053	14118181	100016	- P090	, borgo	
23 - 26	23 - 26	23 - 26	4Q	41	42	
37	38	Carrell !	PIDIXITI	.1011212	· 10/1/2	1 1
111111111111111111111111111111111111111	10034	· VIII018	23 - 26	23 26	23 - 26	1
23 - 26	23 - 26 A4	A5	46	47	PORT	

# THE UNIVERSITY OF CHICAGO, OFFICE OF LEGAL COUNSEL

1001

Hovember 19. 1980

EPA RCRA Activities P.O. Box 7861 Chicago, Illineis 60580

Re: Registration as Generator of Hazardous Mastes

### Gentlemen:

On August 18, 1980, The briversity of Chicago, filed with your effice form #8700-12, Notification of Hamandeet Master Activity for the University of Chicago at its main campus located to the sporth side of Chicago at 5861 S. Ellis Avenue, Chicago, Illinois. At these Mass is used in located that the University was best described as a small panerally of hexardeet waste antegy that I had peneraled and accumulated two acuts halfardees wastes (Payethien and Thiodan) which exponented or would come close to exchanges has one at admin limit prescribed by E. J.A. I has been regulations. After an exhaustive regulation according to commention with the Piling of an application for Hazardeet Master Payett as requested by E. J.A. It has been determined that the University poweration is outlooked by E. J.A. It has been addition to the two previously Plantlement II like one appears that the University may accumulate hazardeet weeks in excess of 100 or even 1800 affects.

There is, therefore, eachesed parent to an exempted Section 3. of 2.7 A. Fore 8700-12, eaches we respectively respect they you at son to the terresective original notification of hexeropus activity fore previously. Needs

It will also be appreciated it you will acknowledge receipt of this latter on the copy enclosed herestth:

Yery truly yours.

Reymond W. Busch

AWB/jb

NOV 24 1980

WE ACKNOWLEDGE RECEIPT OF THE ENCLOSURES AS LISTED ABOVE

Signatur

THE UNIVERSITY OF CHICAGO

5801 ELLIS AVENUE
CHICAGO · ILLINOIS 60637

Office of Legal Counsel

(312) 753-4001

November 19, 1980

EPA RCRA Activities P.O. Box 7861 Chicago, Illinois 60680

Re: Registration as Generator of Hazardous Wastes

1.0 # ILT 180019838

Gentlemen:

On August 18, 1980, The University of Chicago, filed with your office Form #8700-12, Notification of Hazardous Waste Activity, for the University of Chicago at its main campus located on the south side of Chicago at 5801 S. Ellis Avenue, Chicago, Illinois. At that time it was believed that the University was best described as a small generator of hazardous waste except that it had generated and accumulated two acute hazardous wastes (Parathion and Thiodan) which exceeded or would come close to exceeding the one kilogram limit prescribed by E.P.A. regulations. After an exhaustive review made in connection with the filing of an application for Hazardous Waste Permit as requested by E.P.A., it has been determined that the University generates a number of acute hazardous wastes in addition to the two previously disclosed. It also now appears that the University may accumulate hazardous wastes in excess of 100 or even 1000 kilograms.

There is, therefore, enclosed herewith an amended Section IX of E.P.A. Form 8700-12, which we respectfully request that you attach to the University's original notification of hazardous activity form previously filed.

It will also be appreciated if you will acknowledge receipt of this letter on the copy enclosed herewith.

Very truly yours,

Egnenel W. Busch

RWB/jb Encl.

NOV 241980